

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ALASKA VILLAGE ELECTRIC
COOPERATIVE, INC., an Alaska
corporation,

Plaintiff,

v.

ZURICH AMERICAN INSURANCE
COMPANY, a New York corporation;
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA,
THROUGH CHARTIS GLOBAL MARINE,
a Pennsylvania corporation; NATIONAL
CASUALTY COMPANY, a Wisconsin
corporation; GREAT AMERICAN
INSURANCE COMPANY OF NEW YORK,
a New York corporation; and STARR
INDEMNITY & LIABILITY COMPANY, a
Texas corporation,

Defendants.

IN ADMIRALTY AND AT LAW

Lead Case No. 2:11-cv-01375-RAJ

Member Case No. 2:11-cv-01819-RAJ

DECLARATION OF SUSAN K.
GOHEEN

NOTE ON MOTION CALENDAR:
August 1, 2014

I, Susan K. Goheen, declare as follows:

1. I make this declaration from my own first-hand knowledge and after review of my
firm's records.

2. I am a Senior Claims Analyst with International Specialty, Inc. International
Specialty has acted for National Casualty, a defendant in this case, from the date this claim

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DECLARATION OF SUSAN K. GOHEEN: Lead Case No.
2:11-cv-01375 - 1

SCHWABE, WILLIAMSON & WYATT, P.C.
Attorneys at Law
Pacwest Center
1211 SW 5th Ave., Suite 1900
Portland, OR 97204
Telephone: 503.222.9981

1 was first asserted, clear back in approximately May of 2011. I have been assigned to the
2 matter the entire time.

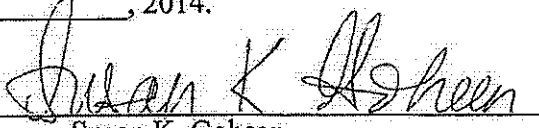
3 3. The firm of Bauer Moynihan & Johnson has acted continuously on behalf of
4 National Casualty and its assureds the entire time.

5 4. There are two full-time claims personnel here at International Specialty's Seattle
6 offices. I identified at least 18 assignments I handled with Bauer Moynihan commencing in
7 2010 and going through the present. My colleague, Ed Thiemann, has had a similar
8 experience on defense of our assureds. Additionally, during the same period, Mr. Thiemann
9 has acted as claims handler on at least four first-party defenses and coverage matters
10 assigned to Bauer Moynihan & Johnson on behalf of National Casualty, including one bad
11 faith/coverage case currently being defended by Bauer Moynihan & Johnson for both
12 National Casualty and National Fire, a co-defendant in this case.

13 5. I am accordingly confident that since this risk was first placed in the summer of
14 2010, Bauer Moynihan & Johnson has continuously had an attorney-client relationship with
15 National Casualty. To the best of my knowledge, no waiver has been requested to act
16 adversely to National Casualty in the AVEC/Vitus Marine case. National Casualty would be
17 highly unlikely to have consented in any event.

18 I declare under penalty of perjury under the laws of the State of Washington that the
19 foregoing declaration is true and correct.

20 Dated this 17th day of July, 2014.

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22 Susan K. Goheen
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DECLARATION OF SUSAN K. GOHEEN: Lead Case No.
2:11-cv-01375 - 2

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SCHWABE, WILLIAMSON & WYATT, P.C.
Attorneys at Law
Pacwest Center
1211 SW 5th Ave., Suite 1800
Portland, OR 97204
Telephone: 503.222.9981

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of July, 2014, I caused to be served the foregoing DECLARATION OF SUSAN K. GOHEEN on the following parties via United States District Court – Western District of Washington’s Electronic Case Filing System (“ECF”) at the following addresses:

- **Claire L. Rootjes**
crootjes@schwabe.com, mawilliams@schwabe.com, centraldocket@schwabe.com
- **Evan T Caffrey**
ecaffrey@hallmaineslugrin.com
- **Andrew R Chisholm**
achisholm@mpba.com, eservice@mpba.com
- **Christopher Ogilvie Davis**
codavis@bakerdonelson.com
- **David Ryan Ebel**
debel@schwabe.com, btaylor@schwabe.com, docket@schwabe.com
- **Michael E Gossler**
mgossler@mpba.com, eservice@mpba.com
- **Daniel F Knox**
dknox@schwabe.com, emclean@schwabe.com, docket@schwabe.com
- **Bert W. Markovich**
bmarkovich@schwabe.com, rsherwood@schwabe.com, centraldocket@schwabe.com
- **Jonathan Robert Moore**
jmoore@mpba.com, eservice@mpba.com

SCHWABE, WILLIAMSON & WYATT, P.C.

By: /s/ Claire L. Rootjes
Bert W. Markovich, OSB #841211
Daniel F. Knox, *Admitted Pro Hac Vice*
David R. Ebel, WSBA #28853
Claire L. Rootjes, WSBA #42178
Attorneys for Defendants
Zurich American Insurance Company,
National Union Fire Insurance Company
of Pittsburgh, PA, through Chartis
Global Marine, National Casualty
Company, Great American Insurance
Company of New York, and Starr
Indemnity & Liability Company

CERTIFICATE OF SERVICE - 1

CASE NO. 2:11-CV-01375-RAJ AND CASE NO. 2:11-CV-01819-RAJ

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SCHWABE, WILLIAMSON & WYATT, P.C.
Attorneys at Law
U.S. Bank Centre
1420 5th Avenue, Suite 3400
Seattle, WA 98101-4010
Telephone 206.622.1711 Fax 206.292.0460